

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED  
JOHN J. HIRMAN  
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UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY S. HANSHAW,  
RONALD S. HATFIELD, and  
JASON D. MAYS,

Defendants.

Case No. \_\_\_\_\_

**1:14CR-120**

**J. BLACK**

INDICTMENT

18 U.S.C. § 241

18 U.S.C. § 242

18 U.S.C. § 2

The Grand Jury charges that:

COUNT ONE

1. On or about August 16 through at least August 17, 2014, in Lawrence County, in the Southern District of Ohio, the defendants,

JEREMY S. HANSHAW,  
RONALD S. HATFIELD, and  
JASON D. MAYS,

while acting under color of law as deputies of the Lawrence County Sheriff's Office, willfully combined, conspired and agreed with one another, to injure, oppress, threaten and intimidate L.K., in the State of Ohio, in the free exercise and enjoyment of a right secured to him by the Constitution of the United States, namely the right to be free from the use of unreasonable force by one acting under color of law, in violation of Title 18 United States Code, Section 241.

Overt Acts

2. In furtherance of the conspiracy, and to effect the object thereof, at least one of the co-conspirators committed at least one of the following overt acts:

- a. On or about August 16, 2014, defendant **HANSHAW** slammed L.K. against a door in the booking area, when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- b. On or about August 16, 2014, defendant **HATFIELD** kicked L.K., when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- c. On or about August 16, 2014, defendant **HATFIELD** punched L.K. in the torso, when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- d. On or about August 16, 2014, defendant **HANSHAW** slammed L.K. to the ground, when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- e. On or about August 16, 2014, defendant **HANSHAW** put L.K. in a chokehold, when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- f. On or about August 16, 2014, defendant **HATFIELD** punched L.K. in the abdomen while lying on top of L.K., when L.K. was restrained in a chokehold by defendant **HANSHAW**, and when L.K. was handcuffed behind his back and he was not resisting or posing a physical threat to any officer;
- g. On or about August 16, 2014, defendant **MAYS** attempted to block a surveillance camera while defendant **HANSHAW** had L.K. in a chokehold on the floor and while defendant **HATFIELD** was lying on top of L.K.;
- h. On or about August 16, 2014, defendant **HATFIELD** grabbed and held L.K. by the neck, when L.K. was handcuffed behind his back and L.K. was in a restraint chair, and not resisting or posing a physical threat to any officer;
- i. On or about August 17, 2014, defendant **HATFIELD** struck L.K. in the knee, when L.K. was handcuffed behind his back and L.K. was in a restraint chair, and not resisting or posing a physical threat to any officer;
- j. On or about August 17, 2014, defendant **HANSHAW** smothered L.K., when L.K. was handcuffed behind his back and L.K. was in a restraint chair, and not resisting or posing a physical threat to any officer;
- k. On or about August 17, 2014, defendant **HANSHAW** choked L.K. and delivered an elbow strike to L.K.'s head, when L.K. was restrained on a medical gurney and he was not resisting or posing a physical threat to any officer;
- l. On or about August 17, 2014, after defendant **HANSHAW** struck L.K. on the head, defendant **MAYS** struck L.K. in the neck area with a closed fist, when L.K.

was restrained on a medical gurney and he was not resisting or posing a physical threat to any officer;

- m. On or about August 17, 2014, one or more of the defendants wrote false entries on logs and reports in which they created a false justification for the assault on L.K.; and
- n. On or about August 17, 2014, defendant **HANSHAW** falsely told a coworker that L.K. was combative in an attempt to justify the assault on L.K.

**All in violation of Title 18, United States Code, § 241.**

**COUNT TWO**

On or about August 16 through at least August 17, 2014, in Lawrence County, in the Southern District of Ohio, the defendants,

**JEREMY S. HANSHAW,  
RONALD S. HATFIELD, and  
JASON D. MAYS,**

while acting under color of law as deputies of the Lawrence County Sheriff's Office, willfully deprived L.K. of a right secured and protected by the Constitution of the United States, namely the right to be free from the use of unreasonable force by one acting under color of law.

Specifically, the defendants assaulted and injured L.K. inside the Lawrence County Jail during the booking process, while L.K. was restrained and not posing a physical threat to anyone. The offense resulted in bodily injury to L.K.

**All in violation of Title 18, United States Code, §§ 242, 2.**

A TRUE BILL.

  
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GRAND JURY FOREPERSON

CARTER M. STEWART  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ANTHONY SPRINGER  
CINCINNATI BRANCH CHIEF